

October 7, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

*Re: Misuse of Internet Protocol (IP) Captioned Telephone Service, CG Docket No. 13-24;
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with
Hearing and Speech Disabilities, CG Docket No. 03-123; Petition for Declaratory
Ruling and/or Rulemaking on Live Closed Captioning Quality Metrics and the Use of
Automatic Speech Recognition Technologies, CG Docket No. 05-231*

Dear Ms. Dortch,

I write to incorporate the attached emails into the above-referenced dockets.

Respectfully submitted,

/s/ Loretta Herrington

Loretta Herrington
World Institute on Disability
3075 Adeline Street, Suite 155
Berkeley, CA 94703
loretta@wid.org

cc: Travis Litman
Randy Clarke

From: Loretta Herrington <loretta@wid.org>
Sent: Tuesday, October 1, 2019 9:48 AM
To: travis.litman@fcc.gov
Cc: Danielle Applegate <dapplegate@vetsfirst.org>; Keri Gray <kgray@aapd.com>; Rylin Rodgers <rrodgers@aucd.org>; Susan Prokop <SusanP@pva.org>
Subject: Thank you from Clear2Connect

Dear Travis,

Thank you for taking the time to meet with members of the Clear2Connect Coalition on Friday, September 27, 2019. The opportunity to connect was incredibly valuable to our efforts and we appreciate the insights you provided.

We wanted to follow up regarding some key topics addressed during the meeting and provide some additional resources to highlight our concerns regarding Automatic Speech Recognition (ASR) only providers for Internet Protocol Captioned Telephone Services (IP CTS).

As we emphasized, it is our firm belief that until quality measures and standards are implemented for ASR technology, the FCC should not certify ASR-only providers of IP CTS. The first section of the Communications Act of 1934 declares that the purpose of the FCC is "regulating interstate and foreign commerce in communication by wire and radio so as to make available, so far as possible, to **all** the people of the United States a rapid, efficient, nationwide, and worldwide wire and radio communication service with adequate facilities." People with disabilities must be part of this, as Title IV of the Americans with Disabilities Act (ADA) sets forth. The ADA specifies that telecommunications services must be "functionally equivalent" to that available to non-disabled Americans. As such, it is incumbent upon the FCC to establish metrics and standards for ASR that ensure accurate, accessible telecommunications services are available to individuals with hearing disabilities in the United States.

Further, it is crucial to note that current ASR technologies are trained using biased data and are therefore not ready to handle varied communication circumstances, such as background noise, voices of certain pitches, or accents. For more information, please see our video on ASR, which highlights these issues and provides insights from an expert on the subject. Scroll to the end of the page to view: <https://clear2connect.us/the-issue/>

Please let us know if you have any other questions about the concerns we expressed. We look forward to receiving your recommendations for our advocacy moving forward both with FCC leadership and on Capitol Hill.

Thank you,
The Clear2Connect Coalition
Represented by Loretta Herrington of the World Institute on Disability (WID)
Loretta Herrington
World Institute on Disability
Managing Director
External Affairs & International Development
www.wid.org
Skype: lmherrington
703.623.3825 (mobile)

From: Loretta Herrington <loretta@wid.org>
Sent: Tuesday, October 1, 2019 9:50 AM
To: randy.clarke@fcc.gov
Cc: Danielle Applegate <dapplegate@vetsfirst.org>; Keri Gray <kgray@aapd.com>; Rylin Rodgers <rrodgers@aucd.org>; Susan Prokop <SusanP@pva.org>
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